

**IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

**PROGRESSIVE AMERICAN  
INSURANCE COMPANY,**

**Plaintiff,**

**v.**

**CAROL THORN, JOLEEN LEEA  
COLON; DALE EUGENE  
KIRKINDOLL; ELIZABETH S.  
KIRKINDOLL; THOMAS HOLT  
KIRKINDOLL; JAMES W. GRIFFIN;  
SANDRA L. GRIFFIN; PATRICK A.  
BELT; CHRISTOPHER B. BELT;  
GENE STEGMAIER; ESTATE OF  
WILLIAM R. KLAUSS, a deceased  
minor; ESTATE OF CHERETY  
THORN, a deceased minor; LV  
STABLER MEMORIAL HOSPITAL;  
BRPT LAKE REHABILITATION  
CENTER; BUTLER COUNTY  
EMERGENCY SERVICES**

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**CIVIL ACTION #: 2:06cv717-SRW**

**Defendants.**

**DEFENDANTS DALE EUGENE KIRKINDOLL; ELIZABETH S. KIRKINDOLL; and  
THOMAS HOLT KIRKINDOLL'S NOTICE OF FILING OF DISCOVERY DOCUMENTS**

COME NOW the Defendant "Kirkindolls" and hereby give notice of filing of the following :

  X   Interrogatories and Requests for Production for LV Stabler Memorial Hospital, BRPT Lake Rehabilitation Center, Butler County Emergency Medical Services, Southern National Life Insurance Company, Baton Rouge Clinic, Gems, Inc., Schumacher Medical Group of Alabama, Our Lady of the Lake Regional Medical Center; and Baton Rouge Orthopedic Clinic, LLC.

Respectfully Submitted,

/s/ SIDNEY W. JACKSON, III  
SIDNEY W. JACKSON, III(JAC024)  
MATHEW B. RICHARDSON (RIC050)  
JACKSON, FOSTER & GRAHAM, L.L.C.  
Post Office Box 2225  
Mobile, AL 36652  
251-433-6699  
251-433-6127

**CERTIFICATE OF SERVICE**

I do hereby certify that I have this 6th day of September, 2007, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Greer Burdick Mallet and Richard Earl Smith  
counsel for LV Stabler Memorial Hospital  
Christian & Small, LLP  
505 20th Street North  
1800 Financial Center  
Birmingham, AL 35203-2695

BRPT Lake Rehabilitation Center  
5414 Brittany Drive, Suite 9  
Baton Rouge, LA 70808

Butler County Emergency Medical Services  
16440 Highway 84  
Evergreen, AL 36401

Southern National Life Insurance Company d/b/a  
Benefit Management Services  
c/o Michelle Calcadro  
5525 Reitz Avenue  
Baton Rouge, LA 70809

Baton Rouge Clinic  
c/o Edgar H. Silvey  
7373 Perkins Road  
Baton Rouge, LA 70808

GEMS, Inc.  
c/o Benny Abrams  
Eutaw City Hall  
116 Main Street  
Eutaw, AL 35462

Schumacher Medical Group of Alabama  
c/o the Corporation Company  
2000 Interstate Park Drive, Suite 200  
Montgomery, AL 36109

Our Lady of the Lake Regional Medical Center  
c/o Robert C. Davidge  
5000 Hennessey Blvd.  
Baton Rouge, LA 70808

Baton Rouge Orthopedic Clinic, LLC  
c/o John L. Dardenne, Jr.  
356 St. Charles Street  
Baton Rouge, LA 70821